

**Hearing Date and Time: February 10, 2010 at 9:45 a.m. (EST)**  
**Objection Deadline: February 3, 2010 at 4:00 p.m. (EST)**

Joshua I. Divack  
HAHN & HESSEN LLP  
488 Madison Avenue  
New York, New York 10022  
Telephone: (212) 478-7200  
Facsimile: (212) 478-7400  
jdivack@hahnhausen.com

*Attorneys for William Hardee*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Case No. 09-50026 (REG)  
: Chapter 11 (Jointly Administered)  
MOTORS LIQUIDATION CORP., *et al.*, :  
:   
Debtors. :  
-----X

**NOTICE OF HEARING OF REQUEST FOR  
PAYMENT OF ADMINISTRATIVE EXPENSES**

**PLEASE TAKE NOTICE** that on November 24, 2009 the undersigned filed and served the Request for Payment of Administrative Expense pursuant to 11 U.S.C. § 503(b) (the “Administrative Claim Request”) [Docket No. 4539] annexed hereto as Exhibit A, in the above-captioned proceeding.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) will be held in connection with the relief requested in the Administrative Claim Request and any further relief before the Honorable Robert E. Gerber at the United States Bankruptcy Court for the Southern District of New York (the “Court”), Courtroom 621, One Bowling Green, New York, NY 10004-1408 on **February 10, 2010 at 9:45 a.m.**

**PLEASE TAKE FURTHER NOTICE** that objections or responses, if any, to the Administrative Claim Request shall be in writing, shall state with particularity the reasons for the objection or response and shall be (a) filed with the Court, with a copy delivered to the chambers of the Honorable Robert E. Gerber, and (b) served upon: (i) counsel for the claimant, Joshua I. Divack, Esq., Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022, and James C. Morton, Esq., Suite 1350, Two Midtown Plaza, 1349 West Peachtree Street, Atlanta, GA 30309; and (ii) the Master Service List listed in the Amended Order to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures [Docket No. 4676] so as to ensure *actual receipt* by no later than **February 3, 2010 at 4:00 p.m.** Only those objections or responses which have been timely filed and served may be considered by the Court at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that failure to respond in accordance with this notice may result in the Court granting the relief requested by the Administrative Claim Request without further notice or hearing.

Dated: New York, New York

January 7, 2010

**HAHN & HESSEN LLP**

By: /s/ Joshua I. Divack  
Joshua I. Divack

488 Madison Avenue  
New York, New York 10022  
Telephone: (212) 478-7200  
Facsimile: (212) 478-7400  
[jdivack@hahnhausen.com](mailto:jdivack@hahnhausen.com)

*Attorneys for William Hardee*

OF COUNSEL:  
George W. Fryhofer III

Georgia Bar No. 279110  
Leigh Martin May  
Georgia Bar No. 473389  
Alan J. Hamilton  
Georgia Bar No. 320698  
BUTLER, WOOTEN & FRYHOFFER, LLP  
2719 Buford Highway  
Atlanta, Georgia 30324  
Telephone: (404) 321-1700  
Facsimile: (404) 321-1713  
george@butlerwooten.com  
leigh@butlerwooten.com  
alan@butlerwooten.com

James C. Morton  
Georgia Bar No. 526025  
Suite 1350, Two Midtown Plaza  
1349 West Peachtree Street  
Atlanta, Georgia 30309  
Telephone: (404) 966-5133  
jcm-law@comcast.net

Stephen C. Carter  
Georgia Bar No. 114675  
P.O. Box 368  
Hartwell, GA 30643-0368  
Telephone: (706) 376-4754  
Facsimile: (706) 376-3322  
scc30643@yahoo.com